

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARK MARTELL, on behalf of himself and all  
others similarly situated,

Plaintiff,

vs.

X CORP.,

Defendant.

Case No. 23-cv-5449

**DECLARATION OF [REDACTED] IN SUPPORT OF X CORP.'S UNOPPOSED  
MOTION FOR LEAVE TO FILE UNDER SEAL**

I, [REDACTED], declare as follows:

1. I am currently [REDACTED] a wholly owned subsidiary of X Holdings Corp. ("X Holdings"). In my role, I have acquired personal knowledge of X Holdings' policy relating to the confidentiality of its business and financial information, including the identities of its owners/shareholders. The facts set forth in this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge and/or information to which I have access.

2. I submit this declaration in support of X Corp.'s Unopposed Motion for Leave to File Under Seal in the above-captioned case.

3. The identities of the owners/shareholders of X Corp.'s parent company, X Holdings, constitute sensitive confidential and private business information. As a matter of routine practice and policy, X Holdings does not publish or make publicly available information regarding its owners or shareholders and treats such information as confidential. Individuals and entities investing and taking an ownership interest in a private corporation such as X Holdings expect that

such information will remain private. The public disclosure of such information would violate this expectation of privacy. Moreover, in certain cases, X Holdings is contractually bound to keep such information confidential.

4. The disclosure of information regarding its owners/shareholders potentially could enable X Holdings' competitors to undermine X Holdings' competitive position in the marketplace, allow current or prospective business partners or counterparties to take unfair advantage of X Holdings in negotiations or other business affairs, or otherwise prejudice X Holdings' business interests. To that end, X Corp. and X Holdings Corp. have implemented and maintained policies that prohibit employees from accessing information beyond what is reasonably necessary to perform their duties, limiting access to certain non-public information, permitting access to documents and data on a need-to-know-basis, and requiring employees to sign confidentiality agreements.

5. I understand that X Corp.'s Unopposed Motion for Leave to File Under Seal requests that the Court maintain information regarding the identities of X Holdings' owners/shareholders under seal. This information is private and confidential, and the disclosure of such information would be injurious to those owners/shareholders and X Holdings for the reasons stated above.

6. I also understand that X Corp.'s Unopposed Motion for Leave to File Under Seal requests that the Court maintain under seal certain identifying information contained in this declaration. I may face threats, harassment, and an invasion of privacy if my identity were disclosed, and the disclosure of such identifying information would be injurious to me for those reasons.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 14, 2023 in [REDACTED].

[REDACTED]

[REDACTED]